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December 7, 1983

U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, New York 10278

Attn: William J. Librizzi, Director
Office of Emergency and Remedial Response

Re: Tifa Limited Information Request

Dear Mr. Librizzi:

Our office is in receipt of your letter of November 15, 1983, requesting information under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). As you are well aware, we have at all times extended our utmost cooperation to your office with respect to the deposits of asbestos waste on the premises currently owned by Tifa Limited.

In response to your request for information, we would like to advise you of the following:

(1) Tifa Limited is a New Jersey corporation and not a division or subsidiary of any other company;

(2) Tifa Limited produces no waste from its manufacturing processes used at the Millington site other than solid waste in the form of normal garbage. We have an assembly line where we build our machines for spraying chemicals. We do not manufacture, store or dispose of chemicals at the site;

(3) Tifa generated no hazardous materials. As you know the former owner of the premises, National Gypsum left asbestos deposits on the site;

(4) Since Tifa Limited did not generate, transport or dispose of any hazardous substance question 4 does not seem applicable to Tifa Limited.

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(5) Since Tifa Limited did not generate, transport or dispose of any hazardous substance question #5 does not seem applicable to Tifa Limited;

(6) Since Tifa Limited did not generate, transport or dispose of any hazardous substance question #6 does not seem applicable to Tifa Limited;

(7) Attached hereto is a copy of our indemnification agreement with National Gypsum Company which I believe provides references for you to use respecting certain actions by the New Jersey Department of Environmental Protection against National Gypsum Company. If after review of that document you require further information, please do not hesitate to contact our office;

(8) National Gypsum Company and another asbestos manufacturer named _____ deposited asbestos/cement waste on the site. It is believed that this was done during a lengthy period of time beginning approximately at the turn of the century and continuing until the premises were closed. I am sure that National Gypsum Company can provide all the details;

(9) Enclosed is a copy of a report that indicates that there is asbestos on the site. A copy of that report is enclosed for your review.

(10) Tifa Limited never disposed of, transported or generated any hazardous material and therefore, question #10 does not apply;

(11) National Gypsum Company filed a foreclosure action against our property which has been settled. There was also litigation respecting National Gypsum's Company failing to properly maintain the site and live up to their agreements. This litigation was also settled;

(12) None

(13) Attached hereto is a pollution liability insurance policy which Tifa Limited is currently reviewing and we would appreciate your comments on the policy. We have not purchased this coverage yet and would appreciate your office analyzing the policy in order that we may make an informed decision.

I certify that the foregoing answers and supporting documentation to the EPA's request for information are true, complete and accurate to the best of my knowledge and belief.

TIFA LIMITED,
A New Jersey Corporation

BY: _____

ARNOLD M. LIVINGSTON,
Secretary

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